

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON DIVISION

THE INDEPENDENCE PROJECT, INC.,  
a New Jersey Non-Profit Corporation, and  
RONALD MOORE, Individually,

Plaintiffs,

vs.

Case No: 3:18-cv-08805-MAS-DEA

ARROWHEART REALTY COMPANY,  
LLC, a New Jersey Limited Liability  
Company,

Defendant.

STIPULATION FOR DISMISSAL WITH PREJUDICE

Plaintiffs and Defendant, pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice, a resolution of all matters in dispute having been made pursuant to a Settlement Agreement executed between the parties. The parties have stipulated in their agreement that the Court retain jurisdiction to enforce the terms and conditions of the Settlement Agreement.

Respectfully Submitted,

/s/Keith Harris

Keith Harris, Esq. (KH4604)  
Braff, Harris, Sukoneck & Maloof  
570 W. Mt. Pleasant Avenue, Suite 200  
Livingston, NJ 07039-0657  
Telephone: (973) 994-6677  
Facsimile: (973) 994-1296  
[kharris@bhsm-law.com](mailto:kharris@bhsm-law.com)

and

John P. Fuller, Esq., *pro hac vice* pending  
Fuller, Fuller & Associates, P.A.  
12000 Biscayne Boulevard, Suite 502  
North Miami, FL 33181  
Telephone: (305) 891-5199  
Facsimile: (305) 893-9505  
[jpf@fullerfuller.com](mailto:jpf@fullerfuller.com)  
*Attorneys for Plaintiffs*

Date: January 25, 2019

/s/Christopher J. O'Connell

Christopher J. O'Connell, Esq.  
Sweeney & Sheehan, PC  
216 Haddon Avenue, Suite 500  
Westmont, NJ 08108  
Telephone: (856) 869-5600  
Facsimile: (856) 869-5605  
[chris.oconnell@sweeneyfirm.com](mailto:chris.oconnell@sweeneyfirm.com)  
*Attorneys for Defendant*

Date: January 25, 2019

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON DIVISION

THE INDEPENDENCE PROJECT, INC.,  
a New Jersey Non-Profit Corporation, and  
RONALD MOORE, Individually,

Plaintiffs,

vs.

Case No: 3:18-cv-08805-MAS-DEA

ARROWHEART REALTY COMPANY,  
LLC, a New Jersey Limited Liability  
Company,

Defendant.

ORDER OF DISMISSAL WITH PREJUDICE

THIS MATTER is before the Court upon the Stipulation for Dismissal With Prejudice.

The Court having carefully reviewed said Stipulation and after due consideration, it is

ORDERED AND ADJUDGED as follows:

1. The Stipulation For Dismissal With Prejudice filed herein by the Plaintiffs, and the Defendant, be and the same is hereby approved;
2. The above-styled cause be and the same is hereby **DISMISSED** with prejudice;
3. The Court retains jurisdiction of the above-styled cause solely for the purpose of enforcing the Settlement Agreement; and
4. To the extent not otherwise disposed of herein, all pending Motions are hereby **DENIED** as moot.

DONE AND ORDERED in Chambers at Trenton, New Jersey, this 28<sup>th</sup> day  
of January, 2019.

Maskey  
UNITED STATES DISTRICT JUDGE

Copies furnished to:  
Attorneys of record